

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

PEGGY BRANNING,

Plaintiff,
VS.

No. _____

MINACT, Inc.,

Defendant.

COMPLAINT

TO THE UNITED STATES DISTRICT COURT JUDGES OF THE WESTERN
DISTRICT OF TENNESSEE, WESTERN DIVISION:

1. Plaintiff is a resident and citizen of Shelby County, Tennessee and she resides at 453 Avalon, Memphis, Tennessee, 38109.

2. Defendant, MINACT, Inc., is a corporation authorized to do business in the State of Tennessee and in fact conducting business in the State of Tennessee. The agent for service of process for the Defendant is James T. Harris, 1555 McAlister Drive, Memphis, Tennessee, 38116.

3. Plaintiff was employed for the Defendant as a teacher of English, Social Studies and Math.

4. The Plaintiff filed a charge of discrimination with the EEOC heretofore.

Thereafter, the EEOC furnished her with a Dismissal and Notice of Rights Form, which was dated October 31, 2011, which affords the Plaintiff the right to file suit in this court pursuant to certain restrictions that are outlined therein. The Plaintiff incorporates by reference all of the specific allegations of her EEOC charge as if stated verbatim. Essentially, Plaintiff contends that she was discriminated against on the basis of her race as to the terms and conditions of her employment, and that she was terminated on account of her race.

5. Plaintiff alleges that her termination violated the employment laws of the United States in that she was terminated as a result of race which was inconsistent and in contravention of Title VII of the Civil Rights Act.

Plaintiff was employed by the Defendant for approximately four (4) months in positions with the company. Until shortly before her illegal termination, the Plaintiff had a satisfactory work record with the Defendant.

6. As a result of her wrongful termination, the Plaintiff has been damaged, has suffered lost wages and benefits, lost opportunities, and lost income.

7. All of the explanations of the Defendant as to her termination are wrongful and based on pre-text.

8. Defendant should be enjoined from its wrongful conduct and required to reinstate the Plaintiff and furnish her with back pay and compensatory damages.

WHEREFORE, PREMISES CONSIDERED, IT IS PRAYED:

1. That the Defendant be served with this complaint and be required to answer or

suffer a judgment by default.

2. For compensatory damages, lost pay and benefits, and for attorney fees for the wrongs complained of herein.

3. For injunctive relief for the reinstatement of the Plaintiff.

4. For such further and other relief as to which the Plaintiff may be entitled, including the right to amend or correct this complaint.

RESPECTFULLY SUBMITTED,

s/ Ted I. Jones

Ted I. Jones, #11017
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Attorney for the Plaintiff

STATE OF TENNESSEE

COUNTY OF SHELBY

I, Peggy Branning, hereby state under oath or by affirmation that the facts and allegations contained within this complaint are true and correct to the best of my knowledge, information and belief, and that I am justly entitled to the relief sought.

s/ Peggy Branning

Peggy Branning

s/ Ted I. Jones

Notary Public

My commission expires:
September 26, 2012